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July 29, 2020

**VIA ECF**

Honorable Carol Bagley Amon  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al.*,  
No. 19-cv-0007**

Dear Judge Amon:

We write on Plaintiffs' behalf in response to the so-called "Moving Defendants"<sup>1</sup> July 23, 2020 letter, ECF No. 150, submitting the recent decision in *Atchley v. AstraZeneca UK Ltd.*, No. CV 17-2136 (RJL), 2020 WL 4040345 (D.D.C. July 17, 2020) as supplemental authority.

Plaintiffs agree that the *Atchley* claims were brought under the Anti-Terrorism Act for injuries suffered by U.S. nationals in Iraq and that "over 400 of the plaintiffs in the *Bartlett* case" were also plaintiffs in that case.

That is where the relevant similarity between these cases largely ends.

Accordingly, for the reasons set forth in Plaintiffs' Memorandum of Law Opposing Defendants' Motions to Dismiss, the motions should be denied in their entirety.

Respectfully submitted,

/s/ Gary M. Osen

cc: All Counsel

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<sup>1</sup> "Moving Defendants" comprises all Defendants except Jammal Trust Bank SAL (a Specially Designated Global Terrorist), which filed its own motion to dismiss.